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MICHAEL VALENTINE and JASON
CLARK (limited appearance)

14
15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

17 FORTINET, INC., a corporation

18 Plaintiff,

19 vs.

20 SOPHOS, INC., a corporation, MICHAEL
VALENTINE, an individual, and JASON
CLARK, an individual.

21 Defendants.

22
23 SOPHOS INC. and SOPHOS LTD.,
corporations,

24 Counterclaim Plaintiffs,

25 vs.

26 FORTINET, INC., a corporation,

27 Counterclaim Defendant.
28

Case No. 3:13-cv-05831-EMC

**JOINT STIPULATION AND
[PROPOSED] ORDER MOVING THE
DATE FOR THE HEARING ON
CLARK'S MOTION TO DISMISS,
VALENTINE'S MOTION TO
COMPEL ARBITRATION, AND
SOPHOS' MOTION TO STAY**

Judge: Honorable Edward M. Chen

1 By and through their respective undersigned counsel, Plaintiff Fortinet, Inc. ("Fortinet")
2 and Defendants Sophos, Inc. ("Sophos"), Michael Valentine ("Valentine") and Jason Clark
3 ("Clark") (collectively, the "Parties"), hereby agree and stipulate as follows:

4 WHEREAS, the date for the hearing on Clark's Motion to Dismiss (Dkt. No. 22) and
5 Valentine's Motion to Compel Arbitration and Sophos' Motion to Stay (Dkt. No. 24) are both
6 currently set for Thursday, March 13, 2014 at 1:30 p.m.;

7 WHEREAS, lead counsel for Fortinet is scheduled to be in a jury trial (before the
8 Honorable William H. Alsup, U.S. District Judge) in another, unrelated matter on that same date;
9 and

10 WHEREAS, counsel for Fortinet has requested and counsel for Sophos, Clark and
11 Valentine have agreed, to move the hearing from March 13 to March 27;

12 IT IS HEREBY STIPULATED AND AGREED that the hearing date for Clark's Motion to
13 Dismiss and Valentine's Motion to Compel Arbitration and Sophos' Motion to Stay be changed
14 from Thursday, March 13, 2014 at 1:30 p.m. to Thursday, March 27, 2014 at 1:30 p.m., or to any
15 date and time thereafter acceptable to the Court.

1 DATED: February 26, 2014

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

3 By /s/ John M. Neukom

4 John M. Neukom (Bar No. 275887)
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8 Attorneys for Plaintiff FORTINET, INC.

9 DATED: February 26, 2014

DLA PIPER LLP (US)

11 By /s/ Sean C. Cunningham

12 SEAN C. CUNNINGHAM
KATHRYN RILEY GRASSO
13 RYAN W. COBB
DAVID R. KNUDSON
14 TODD S. PATTERSON (*pro hac vice*)

15 Attorneys for Defendant and Counterclaim
16 Plaintiff SOPHOS INC., Counterclaim
17 Plaintiff SOPHOS LTD. and Defendants
MICHAEL VALENTINE and JASON
18 CLARK (limited appearance)

19
20 **SIGNATURE ATTESTATION**

21 Pursuant to Local Rule 5.1(i)(3), I attest under penalty of perjury that concurrence in the
22 filing of this document has been obtained from Sean C. Cunningham.

23
24 /s/ John M. Neukom

25 John M. Neukom

PROPOSED ORDER

Before the Court is the Parties' Joint Stipulation to move the date of the hearing on Defendant Jason Clark's Motion to Dismiss (Dkt. No. 22) and Defendant Michael Valentine's Motion to Compel Arbitration and Defendant Sophos, Inc.'s Motion to Stay (Dkt. No. 24) from Thursday, March 13, 2014 at 1:30 p.m. to Thursday, March 27, 2014 at 1:30 p.m.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 2/28/14

